

Exhibit A

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11
	:	Case No. 08-13555 (SCC)
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	
	:	
Debtors.	:	
-----	X	

ORDER GRANTING MOTION TO ALLOW DISCLOSURE OF THE DERIVATIVE
QUESTIONNAIRES PURSUANT TO SECTION 107(A) OF THE BANKRUPTCY CODE

Upon the Motion For an Order To Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code,¹ dated March 19, 2015 of Lehman Brothers Holdings Inc. (“LBHI”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors, and on behalf of its affiliates (collectively, “Lehman”), together with the Official Committee of Unsecured Creditors (the “Creditors Committee,” and together with Lehman “Movants”); and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, Loretta C.J.); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the motion having been provided in accordance with the procedures set forth in the Second Amended Order Implementing Certain Notice and Case Management Procedures entered June 17, 2010 [Dkt. No 9635] (the “Case Management Order”) to (i) the United States Trustee for the Southern District of New York; (ii) the attorneys for the Official Committee of Unsecured Creditors; (iii) the Securities and Exchange Commission; (iv) the Internal Revenue Service; (v) the United States Attorney for the Southern District of New York;

¹ Unless otherwise defined herein, capitalized terms used herein shall have the meanings ascribed thereto in the motion.

(vi) all parties who have requested notice in these chapter 11 cases; and all parties who previously submitted a Derivative Questionnaire, and it appearing that no other or further notice need be provided; and the Court having reviewed and considered the motion and any exhibits filed in support thereof; and the Court having held a hearing on **April 8, 2015**; and no objections or other responses having been filed thereto that have not been overruled, withdrawn, or otherwise resolved; and the Court having determined that the relief sought in the motion is in the best interest of all parties in interest and that the legal and factual bases set forth in the motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore; it is

ORDERED that the Motion is granted; and it is further

ORDERED that, notwithstanding anything to the contrary in the Bar Date Order, Movants are authorized to use and produce the Derivative Questionnaires as discovery materials in any Lehman-related adversary proceeding or claim objection; and it is further

ORDERED that for the avoidance of doubt, the term “Derivative Questionnaires” includes subsequent communications relating to the Derivative Questionnaires, including any submissions of supplemental, explanatory or clarifying information; and it is further

ORDERED that in the event information contained in the Derivative Questionnaires is subsequently filed with the Court, such information shall not be entitled to sealed treatment; and it is further

ORDERED that this Order shall be effective and enforceable immediately upon entry; and it is further

ORDERED that this Court retains jurisdiction to resolve any disputes as to the interpretation and enforcement of ~~arising under or related to~~ this Order, ~~including any discovery disputes that may arise between Movants and the~~

Litigation Claimants, and to interpret, implement, and enforce the provisions of this
Order; and it is further

ORDERED that nothing in this order should be construed to limit any Litigation Claimant's
rights to seek or obtain discovery in any adversary proceeding or claims objection.

Dated: _____, 2015
New York, New York

HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE